

US EPA ARCHIVE DOCUMENT



**Missouri Department of Health and Senior Services**

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**Gail Vasterling**  
Acting Director



**Jeremiah W. (Jay) Nixon**  
Governor

September 6, 2013

Debbie Kring  
US EPA  
11201 Renner Blvd  
Lenexa, KS 66219

Re: Proposed Record of Decision Amendment Plan – Oronogo-Duenweg Mining Belt Superfund Site – Jasper County, Missouri – Mine and Mill Waste Operable Unit 1 – July 24, 2013

Dear Ms. Kring:

The Missouri Department of Health and Senior Services (DHSS) was not notified of this proposed amendment but discovered it through the media notice of the public meeting held August 15, 2013. DHSS did not have the necessary time to properly evaluate the document. However, in the sections we have reviewed, we have found items that we are concerned about and recommend be reconsidered.

For sediment action levels, the document says that the numeric action levels for cleanup of the sediments and delta deposits established by the 2004 Record of Decision (ROD) of 2 parts per million (ppm) cadmium, 70 ppm lead, and 250 ppm zinc will be changed. The new proposed action levels for sediment cleanup are 17 ppm cadmium, 219 ppm lead, and 2,949 ppm zinc. The new proposed action level for addressing cadmium is over 3 times greater than the comparison value derived by the Agency for Toxic Substances and Disease Registry (ATSDR) to be protective of chronic exposure by children of 5 ppm cadmium in soil. We recommend the new action level not exceed 5 ppm or that additional information be provided to DHSS and ATSDR for further evaluation.

Although there may be other sections in the document we have concerns about, we are not prepared to comment on them at this time. DHSS looks forward to better collaboration between our agencies on this site in the future so that we have appropriate time to review major changes such as this.

If you have any questions, please contact Jeff Wenzel or Lori Harris at (573) 751-6102.

Sincerely,

Jonathan Garoutte, Chief  
Bureau of Environmental Epidemiology

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Superfund

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